

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

TIG INSURANCE COMPANY,

Petitioner,

-and-

AMERICAN HOME ASSURANCE COMPANY,  
AIU INSURANCE COMPANY, NATIONAL  
UNION FIRE INSURANCE COMPANY OF  
PITTSBURGH, PENNSYLVANIA, and NEW  
HAMPSHIRE INSURANCE COMPANY,

Respondents.

Case No. 21-MC-217 (JMF)

**NOTICE OF RESPONDENTS'  
MOTION FOR RECONSIDERATION  
OF ORDER DENYING  
PETITIONER'S MOTION TO SEAL**

**PLEASE TAKE NOTICE** that, upon the annexed Memorandum of Law in Support of Respondents' Motion to Reconsider Order Denying Petitioner's Motion to Seal, dated March 16, 2021, Respondents American Home Assurance Company, AIU Insurance Company, National Union Fire Insurance Company of Pittsburgh, Pennsylvania and New Hampshire Insurance Company, by and through their undersigned attorneys, will move this Court, before the Honorable Jesse M. Furman, United States District Court Judge, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York, 10007, on a date and time to be set by the Court, for reconsideration of the Court's March 10, 2021 Order denying Petitioner TIG Insurance Company's Motion to Seal Exhibit D and Redact Confidential Arbitration Information in a Petition to Confirm a Final Arbitration Award Pursuant to Federal Rule of Civil Procedure 5.2(d)-(e) and for an order granting Petitioner's Motion to Seal.

Dated: March 16, 2021  
New York, New York

SIMPSON THACHER & BARTLETT LLP

By: /s/ Bryce L. Friedman

Bryce L. Friedman  
Sarah E. Phillips  
425 Lexington Avenue  
New York, New York 10017  
Tel: (212) 455-2000  
Email: bfredman@stblaw.com  
sarah.phillips@stblaw.com

*Attorneys for Respondents American Home  
Assurance Company, AIU Insurance Company,  
National Union Fire Insurance Company of  
Pittsburgh, Pennsylvania, and New Hampshire  
Insurance Company*